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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KYM R. SECRIST, an individual;  
Plaintiff;

V.

DENEFITS, LLC, a foreign limited-liability company; EQUIFAX INFORMATION SERVICES, LLC, a foreign limited-liability company,

Defendant.

Case No.: 2:20-cv-02204-GMN-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO  
RESPOND TO THE COMPLAINT**

Complaint filed: 12/7/2020

1 Plaintiff Kym R. Secrist (“Plaintiff”) and Defendant Denefits, LLC (“Denefits”), by and  
2 through their respective undersigned counsel, hereby submit this Stipulation for Extension of Time  
3 to Respond to the Complaint, in light of the following facts:

4 **RECITALS**

5 Plaintiff initiated this matter by filing a Complaint in the United States District Court, District  
6 of Nevada on December 7, 2020 against Denefits (ECF No. 1);

7 Denefits signed a waiver of service of summons form on January 6, 2021 (ECF No. 6);

8 Pursuant to Rule 4(d), Denefits’ response to the Complaint is currently due on March 8, 2021;

9 Denefits recently lost a key member of its legal team due to COVID-19, and is in the process  
10 of training a newly hired member of the team;

11 As a result of this tragedy, Denefits requires more time to investigate the allegations and  
12 claims set forth in the Complaint;

13 The parties therefore agree to extend Denefits’ time to respond to the Complaint by 21 days  
14 to March 29, 2021, which will give Denefits time to investigate the allegations and claims set forth  
15 in the Complaint and prepare a response as necessary;

16 This is the first stipulation for extension of time to respond to the Complaint filed by the  
17 parties;

18 Therefore, there is good cause to extend Denefits’ time to respond to the Complaint to March  
19 29, 2021, because Denefits needs time to investigate the allegations and claims set forth in the  
20 Complaint and prepare a response as necessary.

21 **STIPULATION**

22 **THEREFORE**, the parties, by and through their respective undersigned counsel, stipulate  
23 and agree to the following, and respectfully request that the Court enter this stipulation as an order:  
24 Denefits’ deadline to respond to Plaintiff’s Complaint is extended to Wednesday, March 29, 2021.

25 **SO STIPULATED.**

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1 Dated: March 3, 2021

2  
3 LAW OFFICE OF KEVIN L.  
4 HERNANDEZ

5 /s/ Kevin L. Hernandez

6 Kevin L. Hernandez, Esq.  
7 Nevada Bar No. 12594  
8 Attorney for Plaintiff

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10 LEX DOMUS LAW

11 By: /s/ Brandi M. Planet

12 Brandi M. Planet  
13 Attorneys for Defendant Benefits, LLC

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15 **ORDER**



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18 DANIEL J. ALBREGTS  
19 UNITED STATES MAGISTRATE JUDGE  
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